

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
THIRD DIVISION**

In Re:

Bankruptcy 09-31625
Chapter 7 Case

John R. Dolan,

Debtor.

APPLICATION FOR EMPLOYMENT OF ATTORNEY

1. Applicant is the trustee in this case.
2. Applicant believes that the employment of an attorney is necessary to represent or assist trustee in carrying out the trustee's duties as follows:

To represent the estate in the recovery of a preference or fraudulent conveyance and such other legal work as may be required.

3. Gordon B. Conn, Jr., and the law firm of Kalina, Wills, Gisvold & Clark, P.L.L.P., 6160 Summit Drive, Suite 560, Minneapolis, MN 55430; 763-789-9000, are qualified by reason of practice and experience to render such representation or assistance. Mr. Conn is certified as a business bankruptcy specialist by the American Board of Certification, and has extensive experience in bankruptcy litigation and other civil litigation. Other lawyers in his firm are experienced in bankruptcy and civil litigation.
4. Proposed compensation and reimbursement of expenses is as follows:
 - A. For matters involving investigation and pursuit of claims on behalf of the estate, one-half of the normal hourly rates for attorneys, law clerks, or legal assistants of the firm, plus a contingent fee equal to one-third of the amount of aggregate recoveries to the estate in excess of \$10,000 which may be obtained by or through the services of Mr. Conn and his law firm.
 - B. For other matters, such as claim objections and the defense of the estate or its interest or property, the normal hourly rates for attorneys, law clerks, or legal assistants of the firm.

- C. Reimbursement for normal and customary expenses incurred by the firm, including but not limited to long-distance telephone tolls, photocopy expenses, computer research and investigation through on-line services such as LEXIS, WESTLAW, and PACER, filing fees, process servers, witness and subpoena fees, public records searches and investigation expenses, and court reporter fees.

Mr. Conn's current normal hourly rate is \$350.00, and current billing rates for other lawyers in the firm who may provide services range from \$190.00 to \$280.00. The firm's current charges for law clerks, legal assistants, and other non-lawyer personnel range from \$90.00 to \$125.00. Billing rates are adjusted from time to time, generally in January of each calendar year.

5. Said professional has disclosed to the undersigned that he has the following connections with the debtor, creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee: None.

WHEREFORE, applicant prays that the Court approve such employment by the trustee.

Dated: March 10, 2010

/e/Michael J. Iannacone
Michael J. Iannacone, Trustee

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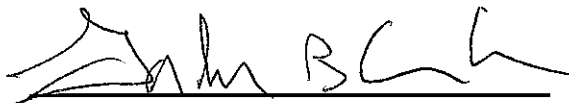
Debtor.

VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)

I, Gordon B. Conn, Jr., of Kalina, Wills, Gisvold & Clark, P.L.L.P., the professional named in the application for employment on behalf of the above named bankruptcy estate, declare under penalty of perjury the following:

1. I and my firm do not hold or represent any interest adverse to the estate and are disinterested as required by 11 U.S.C. § 327.
2. I and my firm do not have any connections to the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the offices of the United States Trustee, except for the following: None.

Dated: March 3, 2010



Gordon B. Conn, Jr. (#18375)
Kalina, Wills, Gisvold & Clark, P.L.L.P.
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Minneapolis, MN 55430
763-789-9000
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**UNSWORN CERTIFICATE
OF SERVICE**

I, Krisann Treague, employed by Michael J. Iannacone, attorney licensed to practice law in this Court, with office address of 8687 Eagle Point Blvd., Lake Elmo, Minnesota, declare that on March 10, 2010, I e-mailed copies of the Application to Approve Employment of Attorney, Verification and proposed Order to each entity named below at the e-mail address stated below for each entity.

Habbo G. Fokkena, Esq.
United States Trustee
USTPRegion12.MN.ECF@usdoj.gov

And, I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on: March 10, 2010

____/e/ *Krisann Treague*____

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ORDER

On _____, 2010, the Application to Employ Gordon B. Conn, Jr., of Kalina, Wills, Gisvold & Clark, P.L.L.P. as attorney for the bankruptcy estate came before the undersigned. Based on the Application, the Recommendation of the United States Trustee, and pursuant to the provisions of Title 11, United States Code, § 327,

IT IS HEREBY ORDERED the professional employment applied for is hereby approved subject to the limitations on compensation provided by Title 11, United States Code, § 328.

Dated: _____

United States Bankruptcy Judge